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# **ADIR INTERNATIONAL, LLC DBA CURACAO**

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*Attorney for Defendant,*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**JOHN CORTES,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

**Plaintiff.**

V

**CURACAO, LTD., A  
CALIFORNIA LIMITED  
PARTNERSHIP; ADIR  
INTERNATIONAL, LLC DBA  
CURACAO.**

### Defendants.

**Case No.:** 13-cv-589 BEN (DHB)

**JOINT MOTION FOR DISMISSAL  
OF THE ACTION WITHOUT  
PREJUDICE PURSUANT TO  
F.R.C.P. 41(A)(1)**

## HON. ROGER T. BENITEZ

Plaintiff JOHN CORTES (“Plaintiff”) and Defendants CURACAO, LTD. A CALIFORNIA LIMITED PARTNERSHIP; and, ADIR INTERNATIONAL, LLC DBA CURACAO (“Defendants”), by and through their undersigned counsel, respectfully submit this Joint Motion for Dismissal pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure.

Plaintiff and Defendants hereby jointly move to dismiss the Action  
WITHOUT PREJUDICE. Each party to bear their own fees and costs.

Date: November 22, 2013

## KAZEROUNI LAW GROUP, APC

By: /s/ Abbas Kazerounian  
ABBAS KAZEROUNIAN, ESQ.  
ATTORNEY FOR PLAINTIFF, JOHN CORTES

Date: November 22, 2013

# **ADIR INTERNATIONAL, LLC DBA CURACAO**

By: /s/ David N. Buffington  
DAVID N. BUFFINGTON, ESO.

ATTORNEY FOR DEFENDANTS, CURACAO LTD; AND, ADIR INTERNATIONAL, LLC DBA  
CURACAO

## SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to David N. Buffington, Esq., counsel for Defendant, and that I have obtained Mr. Buffington's authorization to affix his electronic signature to this document.

Date: November 22, 2013

## KAZEROUNI LAW GROUP, APC

By: /s/ Abbas Kazerounian  
ABBAS KAZEROUNIAN, ESQ.  
ATTORNEY FOR PLAINTIFF, JOHN CORTES

**[ADDITIONAL PLAINTIFF'S COUNSEL]**

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